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## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE:	:	CHAPTER 11
CIRCUIT CITY STORES, INC., ET AL.	; ;	CASE NO: 08-35653-KRH
DEBTORS	<b>:</b> :	(Jointly Administered)
	<b>:</b>	

## MOTION FOR ADMISSION PRO HAC VICE OF DEBRA MORRIS

Mark K. Ames ("Movant"), hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Debra Morris ("Applicant"), to appear *pro hac vice* in the above referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia to represent the Louisiana Department of Revenue. In support of this Motion, Movant states as follows:

 Movant is a member in good standing with the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia Case 08-35653-KRH Doc 10135 Filed 03/14/11 Entered 03/14/11 11:14:32 Desc Page 2 of 3 Main Document

2. Applicant is a member in good standing with the Bar of the Supreme Court of

Louisiana. There are no disciplinary proceedings pending against Applicant in

any jurisdiction in which she is admitted to practice. See Exhibit A attached

hereto.

3. Movant requests that this Court authorize Applicant to file pleadings, appear

at hearings and otherwise participate in the above referenced bankruptcy cases

and related proceedings, on behalf of the Louisiana Department of Revenue.

4. Movant and his firm will serve as co-counsel with Applicant in the above referenced

bankruptcy cases.

5. Applicant's application is appended to this Motion as Exhibit A and

incorporated herein by reference.

6. Notice of this Motion has been given to (a) the Office of the United States

Trustee; (b) counsel for the Debtors, and (c) all persons receiving electronic

notice in the above referenced bankruptcy cases.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing

Debra Morris to appear pro hac vice in above referenced bankruptcy cases and related

proceedings, and grant Movant such other and further relief as is just.

Dated: March 14, 2011

Respectfully submitted by:

/s/Mark K. Ames\_

Mark K. Ames, Movant

Counsel for Commonwealth of Virginia,

Department of Taxation

Mark K. Ames (VA Bar No. 27409) Taxing Authority Consulting Services, P.C. P.O. Box 71476 Richmond, VA 23255 Telephone: (804) 545-2500 Facsimile: (804) 440-1171

Movant

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of March, 2011, a true and exact copy of the foregoing *Motion for Admission Pro Hac Vice* was served on all persons receiving electronic notice in these cases and by email or fax to the following:

Lynn L. Tavenner
Paula S. Beran
Tavenner & Beran, PLC
20 North Eighth Street, 2<sup>nd</sup> Floor
Richmond, VA 23219

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/s/Mark K. Ames
Mark K. Ames